

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION

BROWN COUNTY TAXPAYERS ASSOCIATION,

Plaintiff,

v.

Case No. 22-cv-01171

JOSEPH R. BIDEN, JR., et al.

Defendants.

PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Plaintiff moves, pursuant to Fed. R. Civ. P. 65, for a preliminary injunction prohibiting Defendants from forgiving and/or cancelling federal student loan debt according to the plan announced by President Biden on August 24, 2022, with further details identified on the website for the Office of Federal Student Aid entitled, "One-Time Student Loan Debt Relief," at <https://studentaid.gov/debt-relief-announcement/one-time-cancellation>. In the alternative, if the Court is not inclined to grant this motion, Plaintiff respectfully moves for an injunction pending appeal under Fed. R. App. P. 8(a)(1). The grounds for this motion are set forth in the accompanying brief.

Dated this 4th day of October, 2022.

WISCONSIN INSTITUTE FOR
LAW & LIBERTY, INC.

s/ Daniel P. Lennington

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